

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS, LLC,

DEBTOR.

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Case No. 22—60043

Chapter 11 (Subchapter V)

**SUPPLEMENTAL DISCLOSURE BY ANDINO REYNAL IN CONNECTION WITH
SERVING AS SPECIAL COUNSEL FOR THE DEBTOR
[RELATES TO ECF NO. 94, 110 and 119]**

I, Federico Reynal, declare under penalty of perjury as follows:

1. I am an attorney at law duly admitted and in good standing to practice in the State of Texas, United States District Court for the Southern District of Texas and the Fifth Circuit Court of Appeals. I am the founder of the Houston office of The Reynal Law Firm, P.C. (the “Firm” or “The Reynal Firm”), located at 917 Franklin, Sixth Floor, Houston, Texas 77002.

2. By the Order Approving Debtor’s Application to Employ The Reynal Law Firm, P.C. under 11 U.S.C. § 327(e), as Special Counsel, effective as of July 29, 2022 [ECF No. 119], the Bankruptcy Court approved the retention of my Firm by the Debtor as special litigation counsel.

3. I am providing this Supplemental Disclosure in connection with my Firm serving as Special Counsel for the Debtor (“Supplemental Disclosure”). Unless otherwise indicated, capitalized terms used but not defined herein have the meanings ascribed to such terms in the Application.

4. Except as otherwise noted, all facts set forth in this Supplemental Disclosure are based upon my personal knowledge, upon the client and matter records of The Reynal Firm

reviewed by me or derived from information available to me that I believe to be true and correct or opinion based upon experience, knowledge and information concerning the restructuring of debtor-creditor relationships, workouts, chapter 11 process, and the Debtor. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

5. Since May 19, 2022, FSS retained Schwartz as its Chief Restructuring Officer (“CRO”). Schwartz asked counsel for FSS whether anyone knew of a financial executive who was available to come and work at FSS in the accounting department. I recommended Jeffery Shulse (“Shulse”) to the CRO. Shulse has over twenty years’ experience in providing business, operational and financial consulting to businesses and as a CFO and CEO of businesses in the oil and gas production and construction industries.

6. With the recommendation of the CRO, FSS hired Shulse as FSS’ Business Manager in May of 2022. As the Business Manager, Shulse works with Schwartz and SALLC to (a) implement viable accounting and financial management functions; (b) implement needed internal accounting controls, and (c) establish uniform accounting expense and personnel policies. Shulse has a BBA in accounting from the University of Houston and a J.D. from the University of Houston Law Center.

7. I represented Shulse as a client when he was charged in 2016 in his capacity as the Chief Executive Officer of Black Elk Energy. Shulse was charged with securities fraud and wire fraud conspiracy. Shulse argued for three years that he was unaware of any alleged wrongdoing orchestrated by the Platinum Partners hedge fund, the entity which had installed Shulse as the CEO of Black Elk. Eventually, the prosecution dismissed all the charges against Shulse as long as he avoided other arrests as part of a deferred prosecution agreement.

8. I have been paid all fees owed from Shulse for representing him on the Black Elk matter. Furthermore, I no longer represent Shulse in any capacity.

9. As a result of my representation of Shulse, he and I have become friends, and we occasionally do social events, like dinners, together.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 12, 2022,

By: /s/*Federico Reynal*

Federico Reynal